

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DWIGHT RUSSELL,
JOHNNIE PIERSON,
JOSEPH ORTUNO,

On behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

HARRIS COUNTY, TEXAS,

SHERIFF ED GONZALEZ,

Defendants.

Case No. 4:19-cv-00226
(Class Action)

JOINT MOTION FOR STAY OF 60 DAYS

On February 5, 2019, the Court granted a 90-day stay of proceedings in the above-captioned case so that the parties could discuss settlement. Plaintiffs, Harris County, and the Harris County Sheriff are actively discussing the important issues in this case with each other and with all stakeholders in the County, and are making progress toward a resolution. Although the stakeholders' main focus has been on urgently finalizing a resolution to the misdemeanor bail lawsuit, *ODonnell v. Harris County*, Case No. 4:16-cv-1414 (S.D. Tex. 2016), the parties are simultaneously making progress relating to the felony system as they negotiate new misdemeanor systems and logistics. Accordingly, the parties respectfully request a 60-day stay of proceedings in the above-captioned case to continue settlement discussions.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on May 8, 2019 a true and correct copy of this document properly was served on counsel of record via electronic filing in accordance with the USDC, Southern District of Texas Procedures for Electronic Filing.

/s/ Elizabeth Rossi

Elizabeth Rossi